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SO ORDERED.

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/s/ Jamel K. Semper
HON. JAMEL K. SEMPER
United States District Judge

July 2, 2024

July 3, 2024

Honorable Jamel K. Semper, Judge United States District Court District of New Jersey Martin Luther King Building & U.S. Courthouse 50 Walnut Street Room 4015 Newark, NJ 07101

Re:

McFerrin v. McInerney and Polakoski

Case #: 2:23-cv-11991-JKS-JRA

Dear Judge Semper:

This letter seeks a twenty-eight day extension of the automatic termination of this case as regards Defendant Raymond Polakoski, from July 12, 2024 to August 9, 2024. Defendant Polakoski's attorney consents to this request. This request does not extend to Defendant McInerney. Settlement has been finalized with him.

Adam Meshkov, Esq. and I represent Lauren McFerrin in the referenced matter. On or about May 13, 2024, the parties informed the Court that this matter had settled. On May 13, 2024, the Court entered an Order scheduling a 60 day case termination for July 12, 2024.

The settlement between Plaintiff and Defendant Polakoski has not been finalized and is uncertain. On Monday, July 1, 2024, Defendant Polakoski's attorney informed Attorney Meshkov and I that Defendant Polakoski intends to file bankruptcy in Virginia (where he resides) and that Defendant Polakoski will not sign any settlement paperwork. Defendant Polakoski has not yet filed bankruptcy and there is no clear information when he will.

Honorable Jamel K. Semper, Judge July 2, 2024 Page 2

The brief twenty-eight (28) day extension is requested so that Attorney Meshkov and I can obtain a fuller understanding of the current situation, discuss the situation with our client, and determine how to proceed – e.g., motion to enforce settlement, motion to reinstate claim and the like.

The Court's consideration of this request is appreciated.

Respectfully submitted,

Robert A. Pinel

RAP/hs

cc: Adam Meshkov, Esq. Scott Wilhem, Esq.